

1 Jeff D. Friedman (173886)
2 Shana E. Scarlett (217895)
3 HAGENS BERMAN SOBOL SHAPIRO LLP
4 715 Hearst Avenue, Suite 202
5 Berkeley, CA 94710
6 Telephone: (510) 725-3000
7 Facsimile: (510) 725-3001
8 jefff@hbsslaw.com
9 shanas@hbsslaw.com

6 Steve W. Berman (*Pro Hac Vice*)
7 George W. Sampson (*Pro Hac Vice*)
8 HAGENS BERMAN SOBOL SHAPIRO LLP
9 1918 Eighth Avenue, Suite 3300
10 Seattle, WA 98101
11 Telephone: (206) 623-7292
12 Facsimile: (206) 623-0594
13 steve@hbsslaw.com
14 george@hbsslaw.com

11 Interim Lead Counsel for Indirect
12 Purchaser Plaintiffs

12 [*Additional Counsel Listed on*
13 *Signature Page*]

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

17 IN RE OPTICAL DISK DRIVE PRODUCTS)
18 ANTITRUST LITIGATION)

MDL No. 3:10-md-2143 RS

18)
19) STIPULATION AND ~~PROPOSED~~
20) ORDER TO CHANGE TIME FOR
21) MOTIONS TO COMPEL
22) TRANSACTIONAL DATA

DATE ACTION FILED: Oct. 27, 2009

23 _____)
24 This Document Relates to:)

25 ALL ACTIONS)
26 _____)
27
28

1 WHEREAS on July 17, 2012, this Court entered a Case Management Order, which
2 required the production of all transactional data by October 1, 2012 and all motions to compel
3 related to transactional data to be filed by October 15, 2012;¹

4 WHEREAS certain defendants have indicated they will be unable to produce all
5 transactional data by October 1, 2012;

6 WHEREAS, given the quantity of transactional data to be produced on or after October 1,
7 2012, plaintiffs believe they need more time to meaningfully complete the necessary discovery
8 conferences and file motions to compel transactional data;

9 WHEREAS the parties have been and continue to conduct numerous discovery conferences
10 in an effort to resolve disputes regarding the scope of transactional data to be produced, the import
11 of some of the transactional data for class certification and the contents of transactional data;

12 WHEREAS defendants are agreeable to providing plaintiffs additional time so that the
13 parties may complete discovery conferences prior to any motion practice; and

14 WHEREAS plaintiffs do not seek a further amendment to the class certification schedule at
15 this time, but reserve the right to do so if it becomes necessary.

16 IT IS HEREBY STIPULATED AND AGREED THAT:

17 The parties shall have until November 2, 2012 to file joint letters before the Magistrate
18 Judge regarding disputes on transactional data.

19 IT IS SO STIPULATED.

20 DATED: October 1, 2012

HAGENS BERMAN SOBOL SHAPIRO LLP

21 By /s/ Shana E. Scarlett
22 SHANA E. SCARLETT

23 Jeff D. Friedman (173886)
24 715 Hearst Avenue, Suite 202
25 Berkeley, CA 94710
26 Telephone: (510) 725-3000
jefff@hbsslaw.com
shanas@hbsslaw.com

27 ¹ Case Management Order, July 17, 2012, ECF No. 606 at 4-5.
28

1 DATED: October 1, 2012

LATHAM & WATKINS LLP

2 By /s/ Belinda S. Lee
3 BELINDA S. LEE

4 505 Montgomery Street, Suite 2000
5 San Francisco, CA 94111
6 Telephone: (415) 395-8240
7 Facsimile: (415) 395-8095
8 belinda.lee@lw.com

9 Attorneys for Defendants
10 *TOSHIBA CORPORATION TOSHIBA SAMSUNG*
11 *STORAGE TECHNOLOGY CORP.; and TOSHIBA*
12 *SAMSUNG STORAGE TECHNOLOGY KOREA*
13 *CORP.*

14 DATED: October 1, 2012

DLA PIPER LLP

15 By /s/ David H. Bamberger
16 DAVID H. BAMBERGER

17 500 8th Street, N.W.
18 Washington, DC 20004
19 Telephone: (202) 799-4500
20 Facsimile: (202) 799-5000
21 david.bamberger@dlapiper.com

22 Attorneys for Defendants
23 *TEAC CORPORATION*
24 *TEAC AMERICA INC.*

25 DATED: October 1, 2012

BAKER BOTTS L.L.P.

26 By /s/ John Taladay
27 JOHN TALADAY

28 1299 Pennsylvania Ave NW
Washington, DC 20004
Telephone: (202) 383-7199
Facsimile: (202) 383-6610
john.taladay@bakerbotts.com

Attorneys for Defendants
KONINKLIJKE PHILIPS ELECTRONICS N.V.
LITE-ON IT CORPORATION
PHILIPS & LITE-ON DIGITAL SOLUTIONS CORP.
PHILIPS & LITE-ON DIGITAL SOLUTIONS USA,
INC.

DATED: October 1, 2012

VINSON & ELKINS LLP

By /s/ Matthew J. Jacobs
MATTHEW J. JACOBS

525 University Avenue, Suite 410
Palo Alto, CA 94025
Telephone: (650) 687-8200
Facsimile: (650) 618-1970
mjacobs@velaw.com

Attorneys for Defendant
HITACHI, LTD.
ROPES & GRAY LLP

DATED: October 1, 2012

By /s/ Michelle Visser
MICHELLE VISSER

Three Embarcadero Center
San Francisco, CA 94111-4006
Telephone: (415) 315-6300
Facsimile: (415) 315-6350
michelle.visser@ropesgray.com

Attorneys for Defendants
HITACHI-LG DATA STORAGE, INC.
HITACHI-LG DATA STORAGE KOREA, INC.

DATED: October 1, 2012

EIMER STAHL LLP

By /s/ Ameri R. Klafeta
AMERI R. KLAFFETA

224 S. Michigan Ave., Suite 11
Chicago, IL 60604
Tel: (312) 660-7600
Fax: (312) 692-1718
aklafeta@eimerstahl.com
Attorneys for Defendant

LG ELECTRONICS, INC.
LG ELECTRONICS USA, INC.

DATED: October 1, 2012

BOIES SCHILLER & FLEXNER LLP

By /s/ John F. Cove, Jr.
JOHN F. COVE, JR.

1999 Harrison Street, Suite 900
Oakland, CA 94612
Telephone: (510) 874-1000
Facsimile: (510) 874-1460
jcove@bsflp.com

Attorneys for Defendants
SONY CORPORATION
SONY OPTIARC AMERICA, INC.
SONY OPTIARC, INC.

1
2
3
4 DATED: October 1, 2012

O'MELVENY & MYERS LLP

5 By /s/ Ian Simmons
IAN SIMMONS

6 1625 Eye Street, NW
7 Washington, DC 20006
8 Telephone: (202) 383-5106
9 Facsimile: (202) 383-5414
isimmons@omm.com

10 Attorneys for Defendant
SAMSUNG ELECTRONICS CO., LTD.

11 DATED: October 1, 2012

DICKSTEIN SHAPIRO LLP

12 By /s/ Joel B. Kleinman
JOEL B. KLEINMAN

13 Lisa M. Kaas
14 1825 Eye Street NW
15 Washington, DC 20006-540
16 Tel: 202-420-2200
17 Fax: 202- 420-2201
kleinmanj@dicksteinshapiro.com
kaasl@dicksteinshapiro.com

18 Attorneys for Defendants
BENQ CORPORATION
BENQ AMERICA CORP.

19 DATED: October 1, 2012

WINSTON & STRAWN LLP

20 By /s/ Robert B. Pringle
ROBERT B. PRINGLE

21 Paul R. Griffin
22 Jonathan E. Swartz
23 101 California Street, Suite 3900
24 San Francisco, CA 94111
25 Tel: 415-591-1000
26 Fax: 415-591-1400
rpringle@winston.com
pgriffin@winston.com
jswartz@winston.com

27 Attorneys for Defendant
NEC CORPORATION

1
2
3
4 DATED: October 1, 2012

DEWEY & LEBOEUF LLP

5 By /s/ Jeffrey L. Kessler
6 JEFFREY L. KESSLER

7 David L. Greenspan
8 James F. Lerner
9 George Mastoris
10 1301 Avenue of the Americas
11 New York, NY 10019
12 Telephone: (212) 259-8000
13 Facsimile: (212) 259-6333
14 jkessler@dl.com
15 dgreenspan@dl.com
16 jlerner@dl.com
17 gmastoris@dl.com

18 Attorneys for Defendants
19 *PANASONIC CORPORATION*
20 *PANASONIC CORPORATION OF NORTH*
21 *AMERICA*

22 DATED: October 1, 2012

CONNOLLY BOVE LODGE & HUTZ LLP

23 By /s/ Minda R. Schechter
24 MINDA R. SCHECHTER

25 Bruce G. Chapman
26 Keith D. Fraser
27 333 S. Grand Avenue, Suite 2300
28 Los Angeles, CA 90071
Telephone: (213) 787-2500
Facsimile: (213) 687-0498
mschechter@cblh.com
bchapman@cblh.com
kfraser@cblh.com

Attorneys for Defendants
QUANTA STORAGE INC.
QUANTA STORAGE AMERICA INC.

* * *

IT IS SO ORDERED.

DATED: 10/2/12 _____



THE HONORABLE RICHARD SEEBORG
UNITED STATES DISTRICT COURT JUDGE